

RECEIVED FOR SCANNING
VENTURA SUPERIOR COURT

PLD-PI-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): MARIAM KUREGYAN, ESQ., SBN 247226 DAVANA LAW FIRM 16000 Ventura Blvd., Suite 880 Encino, CA 91436 TELEPHONE NO: (818) 501-1055 FAX NO. (Optional): (818) 501-1033 E-MAIL ADDRESS (Optional): mariam@davanalaw.com ATTORNEY FOR (Name): Plaintiff, CHRIS PAUL SORIANO		FOR COURT USE ONLY
OCT 1 - 2020		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF VENTURA STREET ADDRESS: 800 South Victoria Avenue MAILING ADDRESS: Same as Above CITY AND ZIP CODE: Ventura, CA 93009 BRANCH NAME: Ventura Hall of Justice		
PLAINTIFF: CHRIS PAUL SORIANO DEFENDANT: MICHAEL RYAN JR. SCANLON <input checked="" type="checkbox"/> DOES 1 TO 20 INCLUSIVE		
COMPLAINT—Personal Injury, Property Damage, Wrongful Death <input type="checkbox"/> AMENDED (Number): Type (check all that apply): <input checked="" type="checkbox"/> MOTOR VEHICLE <input type="checkbox"/> OTHER (specify): <input type="checkbox"/> Property Damage <input type="checkbox"/> Wrongful Death <input checked="" type="checkbox"/> Personal Injury <input type="checkbox"/> Other Damages (specify):		
Jurisdiction (check all that apply): <input type="checkbox"/> ACTION IS A LIMITED CIVIL CASE Amount demanded <input type="checkbox"/> does not exceed \$10,000 <input type="checkbox"/> exceeds \$10,000, but does not exceed \$25,000 <input checked="" type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000) <input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint <input type="checkbox"/> from limited to unlimited <input type="checkbox"/> from unlimited to limited		
CASE NUMBER:		

1. Plaintiff (name or names): CHRIS PAUL SORIANO

alleges causes of action against defendant (name or names):

MICHAEL RYAN JR. SCANLON AND DOES 1 to 20

2. This pleading, including attachments and exhibits, consists of the following number of pages: 5

3. Each plaintiff named above is a competent adult

a. ☐ except plaintiff (name):

(1) ☐ a corporation qualified to do business in California

(2) ☐ an unincorporated entity (describe):

(3) ☐ a public entity (describe):

(4) ☐ a minor ☐ an adult

(a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed

(b) ☐ other (specify):

(5) ☐ other (specify):

b. ☐ except plaintiff (name):

(1) ☐ a corporation qualified to do business in California

(2) ☐ an unincorporated entity (describe):

(3) ☐ a public entity (describe):

(4) ☐ a minor ☐ an adult

(a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed

(b) ☐ other (specify):

(5) ☐ other (specify):

☐ Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

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SHORT TITLE:

SORIANO V. SCANLON, ET. AL.

CASE NUMBER

- 4.
- ☐
- Plaintiff (name):

is doing business under the fictitious name (specify):

and has complied with the fictitious business name laws.

5. Each defendant named above is a natural person

- a.
- ☐
- except defendant (name):

- (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (describe):

(4) ☐ a public entity (describe):(5) ☐ other (specify):

- c.
- ☐
- except defendant (name):

- (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (describe):

(4) ☐ a public entity (describe):(5) ☐ other (specify):

- b.
- ☐
- except defendant (name):

- (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (describe):

(4) ☐ a public entity (describe):(5) ☐ other (specify):

- d.
- ☐
- except defendant (name):

- (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (describe):

(4) ☐ a public entity (describe):(5) ☐ other (specify):☐ Information about additional defendants who are not natural persons is contained in Attachment 5.

6. The true names of defendants sued as Does are unknown to plaintiff.

- a. ☒ Doe defendants (specify Doe numbers): 1-10 INCLUSIVE were the agents or employees of other named defendants and acted within the scope of that agency or employment.
- b. ☒ Doe defendants (specify Doe numbers): 11-20, INCLUSIVE are persons whose capacities are unknown to plaintiff.

- 7.
- ☐
- Defendants who are joined under Code of Civil Procedure section 382 are (names):

8. This court is the proper court because

- a. ☐ at least one defendant now resides in its jurisdictional area.
- b. ☐ the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.
- c. ☒ injury to person or damage to personal property occurred in its jurisdictional area.
- d. ☐ other (specify):

- 9.
- ☐
- Plaintiff is required to comply with a claims statute, and

- a. ☐ has complied with applicable claims statutes, or
- b. ☐ is excused from complying because (specify):

SHORT TITLE:

SORIANO V. SCANLON, ET. AL.

CASE NUMBER:

10. The following causes of action are attached and the statements above apply to each (*each complaint must have one or more causes of action attached*):

- a. ☒ Motor Vehicle
- b. ☒ General Negligence
- c. ☐ Intentional Tort
- d. ☐ Products Liability
- e. ☐ Premises Liability
- f. ☐ Other (*specify*):

11. Plaintiff has suffered

- a. ☒ wage loss
- b. ☐ loss of use of property
- c. ☒ hospital and medical expenses
- d. ☒ general damage
- e. ☐ property damage
- f. ☒ loss of earning capacity
- g. ☒ other damage (*specify*):

ACCORDING TO PROOF AT TRIAL

12. ☐ The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. ☐ listed in Attachment 12.
- b. ☐ as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. Plaintiff prays for judgment for costs of suit, for such relief as is fair, just, and equitable; and for

- a. (1) ☒ compensatory damages
- (2) ☐ punitive damages

The amount of damages is (*in cases for personal injury or wrongful death, you must check (1)*):

- (1) ☒ according to proof
- (2) ☐ in the amount of: \$

15. ☐ The paragraphs of this complaint alleged on information and belief are as follows (*specify paragraph numbers*):

Date: 10/09/2020

MARIAM KUREGYAN, ESQ.

(TYPE OR PRINT NAME)

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

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FIRST _____ **CAUSE OF ACTION—Motor Vehicle**
(number)

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

Plaintiff (name): CHRIS PAUL SORIANO

MV- 1. Plaintiff alleges the acts of defendants were negligent; the acts were the legal (proximate) cause of injuries and damages to plaintiff; the acts occurred

on (date): 11/07/2018

at (place):

Ventura Boulevard 154 feet East of Camarillo Outlet, Camarillo, CA.

MV- 2. DEFENDANTS

a. ☒ The defendants who operated a motor vehicle are (names):
MICHAEL RYAN JR. SCANLON

☒ Does 1 _____ to 2 _____

b. ☒ The defendants who employed the persons who operated a motor vehicle in the course of their employment are (names):
MICHAEL RYAN JR. SCANLON

☒ Does 3 _____ to 4 _____

c. ☒ The defendants who owned the motor vehicle which was operated with their permission are (names):
MICHAEL RYAN JR. SCANLON

☒ Does 5 _____ to 6 _____

d. ☒ The defendants who entrusted the motor vehicle are (names):
MICHAEL RYAN JR. SCANLON

☒ Does 7 _____ to 8 _____

e. ☒ The defendants who were the agents and employees of the other defendants and acted within the scope of the agency were (names):
MICHAEL RYAN JR. SCANLON

☒ Does 9 _____ to 10 _____

f. ☐ The defendants who are liable to plaintiffs for other reasons and the reasons for the liability are
☐ listed in Attachment MV-2f ☐ as follows:

☐ Does _____ to _____

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SHORT TITLE:

SORIANO V. SCANLON, ET. AL.

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SECOND

(number)

CAUSE OF ACTION—General NegligencePage 5ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): CHRIS PAUL SORIANO

alleges that defendant (name): MICHAEL RYAN JR. SCANLON

☒ Does 1 to 20

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): 11/07/2018

at (place): Ventura Boulevard 154 feet East of Camarillo Outlet, Camarillo, CA.

(description of reasons for liability):

On or about November 7, 2018 at approximately 2:14 p.m., plaintiff CHRIS PAUL SORIANO (hereinafter referred as "Plaintiff") was traveling westbound in the #1 lane on Ventura Boulevard in the City of Camarillo, CA. MICHAEL RYAN JR. SCANLON (hereinafter referred as "Defendant") was also traveling westbound in the # 2 lane on Ventura Boulevard when he made an unsafe turning movement lane change onto #1 lane on Ventura Boulevard. Defendants and each of them failed to entrust, manage, control, operate, direct and drive their vehicle, causing it to collide with plaintiff's vehicle resulting in severe injuries and other damages to Plaintiff.